

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 1195 & 1214

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On March 29, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Turnover of Assets Held by DIG* [D.I. 1195] (the “Motion”).

2. On April 4, 2023, the Debtors filed the *Notice of Filing Revised Proposed Order and Payoff Letter Agreement* [D.I. 1214] (the “Notice”), attaching as Exhibit A-1 thereto a revised proposed form of order (the “Revised Order”). A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached to the Notice as Exhibit A-2. As set forth in the Notice, the deadline to object to the Motion was extended to April 7, 2023 at 4:00 p.m. (ET).

3. As of the date hereof, no formal objections or other responses to the Motion have been filed or served on the Debtors. The Debtors received informal comments (the “Informal Comments”) from the Office of the United States Trustee (the “U.S. Trustee”). To resolve the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Informal Comments, the Debtors filed the Notice which attached as exhibits the Revised Order and revised form of DIG Payoff Letter. Counsel to the U.S. Trustee has advised that the U.S. Trustee does not object to entry of the Revised Order filed with the Notice.

4. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

5. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: April 10, 2023
Wilmington, Delaware

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